



Division of Waste Management
Compliance Assurance/Emergency Response
1356 Hansford Street
Charleston, WV 25301-1401
Phone: 304-558-5989 Fax: 304-558-0256

West Virginia Department of Environmental Protection

Bob Wise
Governor

Michael O. Callaghan
Secretary

Date: February 28, 2002

MEMORANDUM TO: File

SUBJECT: Referral to Enforcement without a Significant Noncomplier Code

FACILITY: Coyne Textile Services

EPA ID#: WVD052574753

The violation being referred for administrative enforcement is not considered to be a Significant Non-Compliance because:

_____ human health nor the environment has been adversely affected at this time.

_____ it is procedural in nature and does not significantly affect the public health or the environment.



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February 28, 2002
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jerry Clay
Coyne Textile Services
1111 Vernon Street
Huntington, WV 25704

Dear Mr. Clay:

Enclosed is a copy of the **Compliance Evaluation Inspection (CEI) Report** completed by a representative of the Director of the Division of Waste Management. This report is based on the inspection conducted February 5, 2002.

Please refer to the **Notice of Violation** for those violations discovered during the course of this inspection. As a result of those violations, this report is being referred for the following action:

<input type="checkbox"/>	Correct noted violations
<input type="checkbox"/>	Notice of Violation
<input checked="" type="checkbox"/>	Enforcement Referral

Thank you for your assistance and cooperation. If you have any questions concerning the inspection or the attached report, please contact Inspector David Farley at (304) 558-5989 Extension 255.

Sincerely,

Christopher M. Gatens
Southern Unit Supervisor
Compliance Assurance and Emergency Response

CMG/kw

cc: Naomi Henry, U.S. EPA
Inspector David Farley
File

INSPECTION FACT SHEET

COMPANY NAME: Coyne Textile Services	EPA ID#: WVD052574753
MAILING ADDRESS: 1111 Vernon Street, Huntington, WV 25704	FACILITY TYPE: Large Quantity Generator
LOCATION: 1111 Vernon Street, Huntington, WV	COUNTY: Wayne
PHONE: (304) 429-5585	HANDLING CODES:
FACILITY CONTACT: Jerry Clay	INSPECTION TYPE: Compliance Evaluation
APPLICABLE REGULATIONS: 40 CFR Part 260-279; Title 33, Series 20, WVDEP Hazardous Waste Management Rule.	HAZARDOUS WASTES GENERATED: D001, D039, D040, D008 sludge from wastewater treatment process (DAF); D039 spent parts cleaning solvent.
DATE INSPECTED: February 5, 2002	INSPECTORS: David Farley, Jeremy Bandy
DATE PREPARED: February 20, 2002	PREPARED BY: David Farley

COMPLIANCE EVALUATION INSPECTION

RE: Coyne Textile Services

DATE INSPECTED: February 5, 2002

INSPECTED BY: David Farley, Jeremy Bandy

DATE PREPARED: February 11, 2002

PREPARED BY: David Farley

On February 5, 2002, a Compliance Evaluation Inspection (CEI) was conducted at Coyne Textile Services at Huntington, WV. The purpose of the CEI was to document the company's compliance with the Resource Conservation and Recovery Act and the associated WVDEP Hazardous Waste Management Rule. Upon arrival at the site the inspectors met with Jerry Clay, the maintenance manager for the plant. Mr. Clay was presented with identification and the purpose of the inspection was discussed.

Coyne Textile Services is a large quantity generator of hazardous waste. The primary waste stream at the facility is the sludge from the wastewater treatment unit, a dissolved air floatation unit (DAF). Another source of hazardous waste generated at the site is the parts cleaning solvent managed by Safety-Kleen. The hazardous waste from the treatment system is stored in a hazardous waste tank behind the plant. This tank is labeled "Hazardous Waste" and has been installed within a secondary containment unit. The secondary containment is made of concrete. Rainwater and any spillage collected within the secondary containment unit is pumped back into the DAF for treatment.

A review of the manifests indicates that the tank is being emptied every 90 days. The waste, which has the hazardous waste codes D001, D040, D039, and D008, is presently being sent to Spring Grove Resource Recovery, a TSDF at 4879 Spring Grove Avenue, Cincinnati, OH. Prior to 10-9-01 the waste was being sent to United Oil Recovery, Inc. at Meriden, CT. Approximately 4700-4900 gallons of hazardous waste is being shipped off site every 90 days by Coyne Textile Services at the Huntington plant. This is an average of about 13,000 pounds of treatment plant sludge monthly.

The Safety-Kleen parts cleaning solvent is being sent to Ashland, KY. Three parts cleaning units are present on site. Every month, or every other month, 10 to 16 gallons of this waste are being manifested off site for disposal. The spent solvent is hazardous for tetrachloroethylene (D039).

The company does its own maintenance on their fleet vehicles. The used oil from the maintenance activities is stored in a 250 gallon used oil tank located within the garage area. This tank is labeled properly. The used oil and antifreeze is being handled by Safety-Kleen. Used oil filters are drained into the tank and the filters are also managed by Safety-Kleen.

At least one monitoring well has been installed outside the main plant area. This well is downgradient of the tetrachlorethylene plume under the main building. The contamination in the soil under the plant was as a result of leakage from the facility when "perc" was used as a cleaning agent in their dry cleaning process. There is no dry cleaning operation at Coyne Textile Services at the present time. The well has been sampled at least one time as of the date of this inspection.

Records

The facility's manifests were reviewed and found to be satisfactory. One of the manifests, for October 9, 2001, was not on site. It was later faxed to me by Coyne's Director of Environmental Affairs.

Training records were also reviewed. An Area of Concern is that no training records were available for the 2001 calendar year (see attachment #1 to this report). 40 CFR Part 265.16(c) requires that this training be performed on an annual basis. The facility must ensure that this training is conducted yearly, and that the instruction is documented.

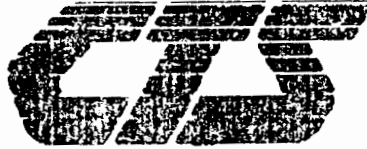
There were no records of inspections conducted on the hazardous waste storage tank during 2001. The facility had records for the years 1997, 1998, 1999, and 2000. These records showed that the tank was being inspected each operating day. Failure to perform inspections of the hazardous waste tank is a violation of 40 CFR Part 265.195(a)(2).

The contingency plan was briefly reviewed. The plan appears to meet the requirements outlined in 40 CFR Part 265.52.

Compliance Evaluation

- **Coyne Textiles Service has failed to document inspections of the hazardous waste storage tank during the 2001 calendar year. This is a violation of 40 CFR Part 265.195(a)(2).**

COYNE INTERNATIONAL
ENTERPRISES CORP.



COYNE TEXTILE SERVICES

ATTACHMENT 1

EXECUTIVE OFFICES:
P.O. BOX 4854
140 Cortland Avenue
Syracuse, New York 13221
(315) 475-1626

ALBANY, NY
ATLANTA, GA
BALTIMORE, MD
BECKLEY, WV
BELLEVILLE, NJ
BETSY LANE, KY
BRISTOL, TN
BUFFALO, NY
BURLINGTON, VT
CHARLOTTE, NC
CHATTANOOGA, TN
CINNAMINSON, NJ
CLEVELAND, OH
COLE, PA
EVANSVILLE, IN
FAIRMONT, WV
FT. LAUDERDALE, FL
GREENVILLE, SC
HAZELTON, PA
HUNTINGTON, WV
JACKSONVILLE, FL
JOLIET, IL
KELAND, FL
LEWISTON, ME
LONDON, KY
LONG ISLAND, NY
NASHVILLE, TN
NEW BEDFORD, MA
PHILADELPHIA, PA
PITTSBURGH, PA
RALEIGH, NC
RICHMOND, VA
SCHENECTADY, NY
SEAFORD, DE
SMITHBORO, NY
SYRACUSE, NY
TOLEDO, OH
WATERBURY, CT
WINCHESTER, VA
WORCESTER, MA
YORK, PA

FAX COVER SHEET

DATE: February 7, 2002

PAGES: 24

TO: Dave Farley

FAX #: (304) 558-1143

COMPANY: WV DEP

FROM: D. J. Smith

FAX #: (315) 475-0057

MESSAGE:

Mr. Farley:

We perform our generator training each year in the spring. However, we cannot find our records from last spring. The most current information I have is from May 2000.

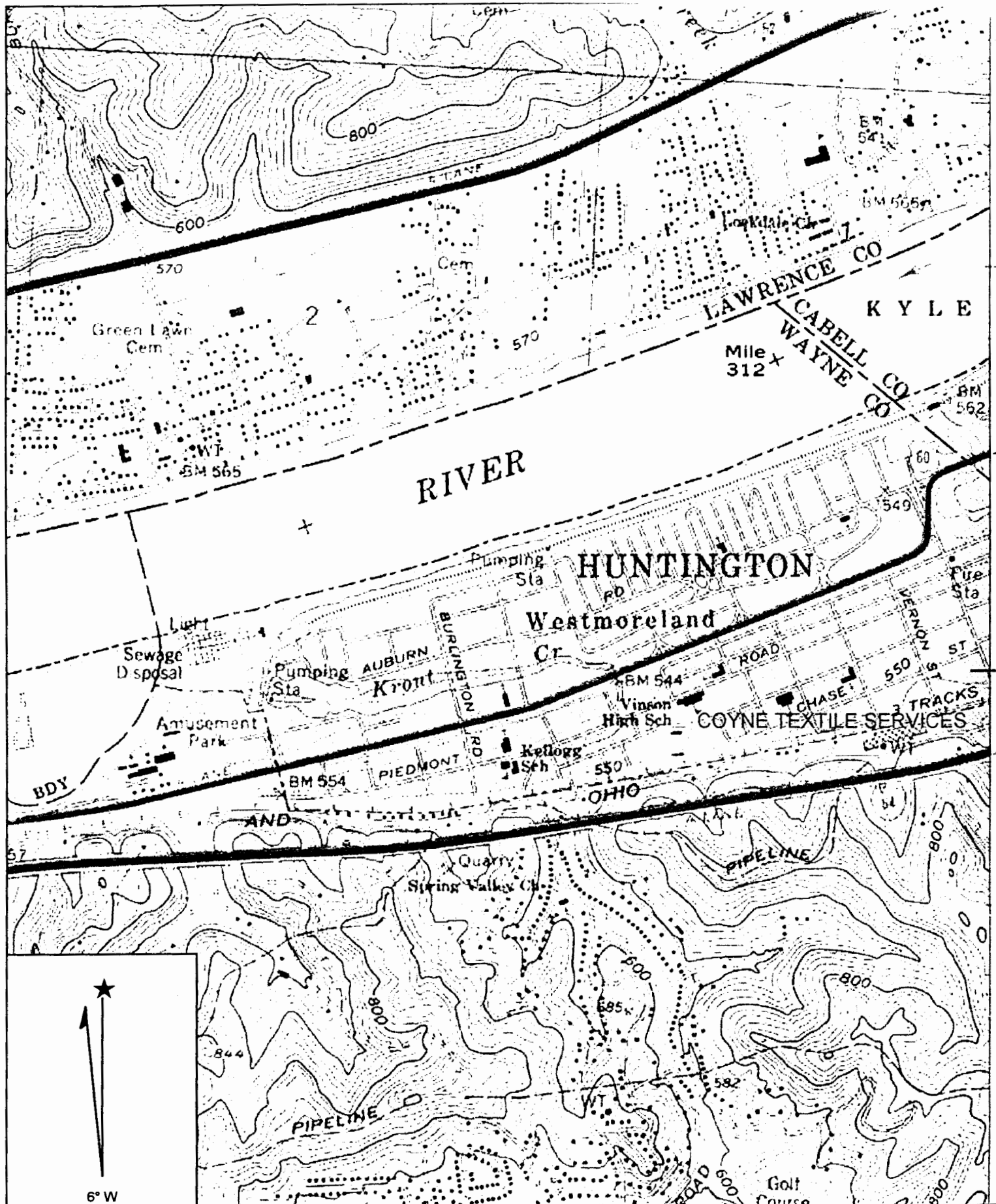
However, we did conduct an updated training session this morning. This was the best we could do in the absence of our training records from last spring. In addition, a member of our corporate staff will be inspecting the facility sometime within the next few weeks.

Please contact me at (315) 475-1626 with any questions.

D. J. Smith

**IF THERE IS A PROBLEM WITH THE TRANSMISSION OF THIS FAX, PLEASE
CALL SENDER AT (315)475-1626.**

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Name: CATLETTSBURG
 Date: 2/20/102
 Scale: 1 inch equals 1333 feet

Location: 038° 24' 07.2" N 082° 31' 04.4" W
 Caption: COYNE TEXTILE SERVICES
 HUNTINGTON, WV



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NOTICE OF VIOLATION

DATE: February 5, 2002	TIME:
ISSUED TO: Coyne Textile Services	EPA ID#: WVD052574753
NOV #:	FACILITY MAILING ADDRESS: 1111 Vernon Street, Huntington, WV 25704
FACILITY REPRESENTATIVE: Jerry Clay	

On the date and time specified, February 5, 2002, an authorized agent of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 22, Section 18 and/or an Order or Permit issued pursuant to 22-18. During that inspection the following violation(s) were noted:

1. A. (Regulation) 40 CFR Part 265.195(a)(2)	B. (Facts) Facility has failed to perform inspections of the hazardous waste storage tank during the 2001 calendar year.

Notes: In order to remediate the above violation you are requested to perform the following actions:

1. Begin documenting inspections of the hazardous waste tank each operating day.

Within 15 days of receipt of this Notice, document your compliance by writing to the Chief, Office of Waste Management, 1356 Hansford Street, Charleston, WV 25301. A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code 22-18-17.

District Phone: 558-5989	Issued By: David Farley
District Fax: 558-1143	Title: Environmental Inspector

EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number		04/95 VERSION	
WVD052574753		Contact Name	Jerry Clay
Handler Name		Coyne Textile Services	
Street	1111 Vernon Street	City	Huntington

UNIVERSE CHANGE REQUIRED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO													
I. Indicate the facility's current universe(s): II. Indicate the new RCRIS Generator Universe (mark only one): <input checked="" type="checkbox"/> SQG <input type="checkbox"/> CEG <input type="checkbox"/> NON-HANDLER <input type="checkbox"/> CLOSED NOTE: All TSD activity changes must be handled by the state data coordinator and cannot be made using this form	III. Indicate the new transporter status (Mark here only if the facility requires a transporter status change): <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2">Transporter [] If the transporter box is checked, you must check at least one of the boxes below: Mark Mode of Transportation</td> <td>Non-Transporter [] Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.</td> </tr> <tr> <td><input type="checkbox"/> Air</td> <td><input type="checkbox"/> Water</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Rail</td> <td><input type="checkbox"/> Other</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Highway</td> <td></td> <td></td> </tr> </table>	Transporter [] If the transporter box is checked, you must check at least one of the boxes below: Mark Mode of Transportation		Non-Transporter [] Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.	<input type="checkbox"/> Air	<input type="checkbox"/> Water		<input type="checkbox"/> Rail	<input type="checkbox"/> Other		<input type="checkbox"/> Highway		
Transporter [] If the transporter box is checked, you must check at least one of the boxes below: Mark Mode of Transportation		Non-Transporter [] Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.											
<input type="checkbox"/> Air	<input type="checkbox"/> Water												
<input type="checkbox"/> Rail	<input type="checkbox"/> Other												
<input type="checkbox"/> Highway													

EVALUATION	Add <input checked="" type="checkbox"/>	Change	Delete	Reason	Branch	Person
Date	Number	Agency	Type			
02 05 02		S	CEI		CAER	WVCFD

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)															
GGR	<input type="checkbox"/> E	GSC	<input type="checkbox"/> E	TWD	<input type="checkbox"/>	DGW	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DWP	<input type="checkbox"/>	BRR	<input type="checkbox"/>	FEA	<input type="checkbox"/>
GLB	<input type="checkbox"/> E	GSQ	<input type="checkbox"/>	DCH	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DPB	<input type="checkbox"/>	DIN	<input type="checkbox"/>	BPS	<input type="checkbox"/>	CSS	<input type="checkbox"/>
GMR	<input type="checkbox"/> E	GEX	<input type="checkbox"/>	DCL	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DPP	<input type="checkbox"/>	DIA	<input type="checkbox"/>	BIS	<input type="checkbox"/>	UOR	<input checked="" type="checkbox"/> E
GOR	<input type="checkbox"/> E	TGR	<input type="checkbox"/>	DCP	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DSI	<input type="checkbox"/>	DPS	<input type="checkbox"/>	BCE	<input type="checkbox"/>	UWR	<input type="checkbox"/>
GPT	<input type="checkbox"/> E	TMR	<input type="checkbox"/>	DFR	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DTR	<input type="checkbox"/>	DOP	<input type="checkbox"/>	BDT	<input type="checkbox"/>		<input type="checkbox"/>
GRR	<input type="checkbox"/> E	TOR	<input type="checkbox"/>	DGS	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DTT	<input type="checkbox"/>	DMI	<input type="checkbox"/>	CAS	<input type="checkbox"/>		<input type="checkbox"/>
Comments Routine RCRA CEI. Facility is a large quantity generator of hazardous waste.															

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION							
Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION	Add <input checked="" type="checkbox"/>	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type
S		GPT		FR
Regulation Citation 40 CFR Part 265.195(a)(2)				
Returned to Compliance				
Date Determined	Priority	Branch	Person	RTC Qualifier
02 05 02			WVDF	
			Scheduled	Actual
			2-15-02	
Comments Facility has failed to perform inspections of the hazardous waste tank during the 2001 year.				

☐ Required
 ☐ Required if pertinent
 ☐ Req'd for prev. reported data
 ☐ Not req'd by EPA